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FEDERAL COMMUNICATIONS COMMISSION
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OFFICE OF THE SECRETARY

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Thousands Block Pooling Administrator)	DA 00-2011
Technical Requirements)	

COMMENTS
OF THE
UNITED STATES TELECOM ASSOCIATION

The United States Telecom Association (USTA)¹ hereby submits its comments on the North American Numbering Council's (NANC) revisions to its Thousands Block Pooling Administrator Technical Requirements (PA Technical Requirements) that were forwarded to the Commission on July 20, 2000 in response to the Commission's directives in the above-captioned proceeding.² In its *Public Notice*, the Commission stated that the NANC recommendations will provide a basis for the Statement of Work in the Commission's solicitation for a Thousands Block Pooling Administrator.

USTA participated in the NANC process that developed the current revisions to the PA Technical Requirements that are the subject of the instant comments. With very few exceptions, USTA supports the determinations of the NANC that are reflected in the

¹ The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

² The Commission sought comments on the revisions in a Public Notice, DA 00-2011, released September 5, 2000 (*Public Notice*).

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current PA Technical Requirements and also supports the timely selection of a Pooling Administrator and implementation of the national thousand block pooling program.

Within this context, USTA offers the following comments on specific aspects of the PA Technical Requirements and the Commission's solicitation of a Pooling Administrator.

1. Unresolved Issues Not Reflected in the Industry Numbering Committee Guidelines

The PA Technical Requirements reference Industry Numbering Committee (INC) Thousand Block Pooling Assignment Guidelines,³ which contain requirements to be followed by the Pooling Administrator. The INC has worked diligently to incorporate the determinations made by the Commission in its *Report and Order and Further Notice of Proposed Rule Making* in the above-captioned proceeding⁴ into both the Thousand Block Pooling Assignment Guidelines and the Central Office (CO) Code Assignment Guidelines. However, questions have been raised by the INC and the industry about specific issues that need to be incorporated in the INC Guidelines for them to accurately and adequately reflect the policies in the *Report and Order*. Those questions have not been answered. Because of this situation, the INC Guidelines and by direct association the PA Technical Requirements do not embody the complete policy determinations of the *Report and Order*.

The existence of these unresolved issues and policies means that the respondents seeking to become the Pooling Administrator will not have a complete understanding of the scope of responsibilities. This situation could result in increased costs, because the respondents will necessarily make certain assumptions in determining the scope of work

³ See §§ 2.16.1, 2.17.

⁴ FCC 00-104, released March 31, 2000 (*Report and Order*).

and associated costs that may need to be adjusted later. Such situations have arisen with the North American Numbering Plan Administrator (NANPA) contract, where questions have arisen regarding whether CO Code applications should be counted as “assignments” or “requests” in terms of the Administrator’s compensation. These issues need to be resolved and the INC Guidelines revised before the PA Technical Requirements are finalized.

2. Commencement of the National Pooling Rollout Schedule

The pooling implementation roll out schedule is addressed in Section 2.10 of the PA Technical Requirements. While Section 2.10.5 states that pooling should begin in “mid-2001,” USTA advocates that pooling rollout should begin no later than August 1, 2001 and that the PA Technical Requirements reflect that specificity. The Pooling Administrator should be selected as soon as possible so that the process to implement thousand block pooling can begin. The process for determining the rollout schedule by NPAs that is set forth in Section 2.10 of the PA Technical Requirements should provide a six month notice period before a carrier has to implement pooling in a particular NPA. However, the nine month start-up period to begin pooling specified by the Commission⁵ is not necessary in the current situation where competitive bids are being solicited for Pooling Administrator. This is demonstrated where two of the interested bidders have reported to state commissions that they can implement number pooling within a six month time frame or sooner.⁶ The implementation process and the PA Technical Requirements should be modified to reflect this time schedule for pooling rollout.

⁵ *Report and Order* at ¶¶ 156, 168.

⁶ *See* the Utah implementation dates put forward by Telecordia and the statements of NeuStar where pooling has already begun.

3. State Adherence to National Pooling Guidelines

Section 2.10.8 of the PA Technical Requirements addresses coordination of the transition for state pooling trials to the national plan. This provision should include the requirement that, once the transition to national rollout of pooling begins, the states should be directed to follow the national pooling guidelines embodied in the INC Guidelines. According to the *Report and Order*, the states engaged in pooling trials are to comply with the national guidelines by September 1, 2000.⁷ This additional language would notify the respondents seeking to become the Pooling Administrator that the Administrator has an obligation to comply with the INC Guidelines as part of their responsibilities.

⁷ *Report and Order* at ¶ 169.

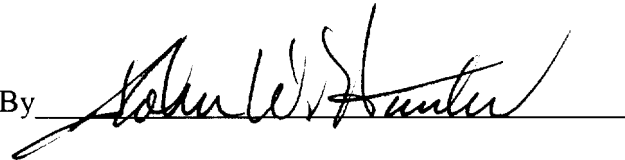
Conclusion

USTA requests that the Commission consider the above comments with regard to the NANC Thousands Block Pooling Administrator Technical Requirements.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By

A handwritten signature in black ink, appearing to read "John W. Hunter", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on September 25, 2000, Comments Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the the attached service list


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